

# **EXHIBIT D**

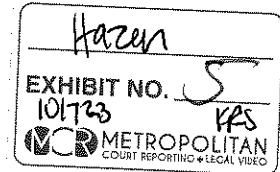
## **[PUBLIC VERSION]**

## Message

**From:** George, Esther L [/O=FRSMail/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=J1ELG01B65]  
**Sent:** 8/6/2020 11:14:06 PM  
**To:** Hazen, Judith [judith.hazen@kc.frb.org]; Humston, Tara L [tara.l.humston@kc.frb.org]  
**Subject:** Re: Wyoming SPDI Conversations

RESTRICTED FR // FRSONLY

Thank you Judith.



---  
 Sent from Workspace ONE Boxer

On August 6, 2020 at 10:27:09 PM CDT, Hazen, Judith <judith.hazen@kc.frb.org> wrote:

RESTRICTED FR // FRSONLY

Esther,

I understand that you will be meeting with Albert Forkner tomorrow morning. I wanted to pass along a few updates from conversations today for your awareness.

Our team has been meeting with Albert and his staff on a weekly basis to discuss a variety of topics related to the SPDI charters (including the applications received and anticipated, as well as the supervisory program under development). Albert and I were able to connect directly this morning to discuss our active review of the applications from Kraken and Avanti (which we recently received), and I shared that there are broader considerations that we must take into account as we think about granting a master account to a SPDI, which will influence how quickly we can act on a master account application once received. Timelines that have been referenced of receiving and acting on an MA application are just unrealistic, for example, an assumption that approval of a charter by the State in late September, followed by application and approval of a master account would result in an institution opening for operation in November. Understandably, Albert was disappointed and while we did not discuss approval or denial, he did share that he does not see a path for a denial based on the legal criteria. He also questioned how the OCC's recent letter on national bank activities should be considered, wondering if a denial of a SPDI would be viewed as preventing new entrants when the activity is permissible for a national bank.

This afternoon during our regularly scheduled weekly meeting with the State, Avanti's leadership team somewhat unexpectedly joined the discussion at the invitation of the State to provide an overview of their business plan (presentation attached). At this time, Avanti's proposal focuses primarily on large institutional investors, looking at opportunities in the custody, payments (including the issuance of a electronic negotiable instrument, the Avit), and services space. We will pull together a more robust summary of activities for you, but wanted to this on your radar as you go into the conversation with Albert.

Please let me know if I can answer any immediate questions.

Judith

CONFIDENTIAL

FRBKC-00000276

<!--  
[if !vml]-



--><!--  
[endif]-->

**Judith Hazen**

*Vice President*

☎: 816.881.2789 ✉: [Judith.Hazen@kc.frb.org](mailto:Judith.Hazen@kc.frb.org)

FEDERAL RESERVE BANK OF KANSAS CITY

1 Memorial Drive · Kansas City, Missouri 64198 < [www.kansascityfed.org](http://www.kansascityfed.org) > > >



<Avanti Presentation for KC Federal Reserve.pdf>